

STATE OF VERMONT
GREEN MOUNTAIN CARE BOARD

In re: Fletcher Allen Health Care,)
Burlington Property Acquisition) GMCB-015-14con
Certificate of Need Application)
)

PROPOSED QUESTIONS FOR THE APPLICANT

Pursuant to Certificate of Need rule 4.406, the Office of the Health Care Advocate submits the following questions for the applicant to the Green Mountain Care Board in the above-captioned Certificate of Need application review.

1. On pages 5-6 of your CON application, you state “Due to the space constraints of the Main Campus, the campus should only host those outpatient services that have the greatest affinities with the inpatient program. Those outpatient services that can reside in a community setting should, over time, move to offsite locations...This strategy will ensure that those physician specialties that care mostly for inpatients, or that serve the most acute and complex outpatients, will continue to stay at the Main Campus, while those practices that do not require proximate clinical connections to the inpatient program will be relocated over time to an off-site location.”
 - a. According to your current assessments, which services are likely to remain on the Main Campus?
 - b. Which services are likely to move to the Tilley Drive properties?
 - c. What analysis, other than the Halsa Report, have you conducted to identify which practices could be relocated to an off-site location?
 - d. Which of the services listed on page 17 of the application as having critical space needs do you believe require proximate clinical connections to the inpatient program?
 - e. Which of the services listed on page 17 of the application as “approaching maximum capacity” do you believe require proximate clinical connections to the inpatient program?
 - f. What children’s service on page 17 do you believe has critical space needs?
 - g. Are there services that will be moved to Tilley Drive due to the planned inpatient room renovation on the main Fletcher Allen campus? If so, which services?

- h. You state in your application that you will be moving services from the UHC campus. Do you plan to move all of the services to the Tilley Drive properties? When do you plan to move services from UHC?
 - i. Is it possible that you will use this property to house your mental health or substance abuse treatment programs?
 - j. Do you plan to temporarily leave empty some spaces in the newly purchased buildings or will all spaces be filled? If you plan to have empty spaces, how much space will be empty and for how long? If you plan to fill all currently empty spaces, how will you fill them?
2. Please supply your Master Facilities Plan.
3. Please supply any reports prepared by Morris Switzer Environments for Health.
4. According to your most recent Community Health Needs Assessment, there are significant transportation issues with the Tilley Drive location. The Burlington/South Burlington bus system requires patients in Burlington to travel for over a half-hour and in some cases over an hour one way. All patients traveling by bus from Burlington must change buses at least once to reach the Tilley Drive location. Once at the nearest bus stop to the Tilley Drive campus, patients must walk for over ten minutes. Some examples based on Google Transit: The shortest bus route from Fletcher Allen's main campus appears to take 46 minutes total, including 2 different buses and 25 minutes of walking. From Main Street in downtown Burlington, the shortest bus route to Tilley Drive appears to take 39 minutes, including two different buses and seventeen minutes of walking, whereas it would take 13 minutes, one bus, and no walking to get to Fletcher Allen's main campus from Main Street. From the Burlington Community Health Center on Riverside Avenue in Burlington, the shortest bus route to Tilley Drive appears to take 53 minutes, 3 different buses, and 17 minutes of walking, while there is an option that takes 23 minutes and two buses but no walking to get to Fletcher Allen's main campus.

As a result of these physical, financial, and time constraints on patients without access to a personal vehicle and their caregivers, a significant number of patients may not be able to reach the Tilley Drive location. These issues will be compounded when a patient is asked to attend an appointment several times a week which is likely for services offered at the campus such as physical therapy. Your proposed project will significantly increase the number of patients who will need to travel to Tilley Drive and the adjacent areas in order to receive treatment.

In light of these issues, and based on the statutory requirements of 18 V.S.A. §9372, 18 V.S.A. §9437, and CON Rule 4.402, please explain and provided data to support:

- a. How the project will reduce the per-capita growth of expenditures for health services in Vermont across all payers while ensuring that access to care is not compromised. Please include in this assessment of expenditures, a reasonable estimate of transportation costs including costs to patients or caregivers, insurers, and public benefit programs.
- b. How the project will enhance patients' experience of care.

- c. How the project will help meet the needs of medically underserved groups and the goals of universal access to health services;
 - d. How the project furthers effective integration and coordination of health care services.
 - e. To what extent moving existing services to the new campus will have an adverse impact on the ability of existing facilities to provide medically necessary services to all in need, regardless of ability to pay or location of residence.
5. What are your plans for implementing energy efficiency measures into this new project?
6. You mention that O'Brien Farm includes some wetlands. Are any areas of land included in this purchase on a flood plain?
7. Do any of your plans for this purchase conflict with any of Fletcher Allen's previous public commitments including requirements contained in the CONs related to the Renaissance Project?
8. In the past five years, have you considered purchasing any property in whole or in part within the City of Burlington? If so, describe the location of the property and the reasons for Fletcher Allen rejecting the property.
9. Why do you need the farm land in addition to the other properties?
10. Do you expect to make payments in lieu of taxes to South Burlington in light of the municipal services you will receive?
11. What are your plans to expand your public transit subsidy programs that help to provide transportation to the Tilley Drive location? What is/will be the cost of this?
12. How will development at the proposed sites impact Medicaid transportation expenditures, especially now that there are more people on Medicaid who get transportation?
13. Do you have any plans to add additional shuttle pick-up locations? Would you be willing to provide shuttle service to Tilley Drive that ran from the Cherry Street bus terminal to the main campus of FAHC and then to Tilley Drive?
14. What changes if any will you make to provide shuttle service for patients who require same day service and therefore cannot call 24 hours in advance of the trip?

Dated at Montpelier, Vermont this 21st day of July, 2014.

s/ Kaili Kuiper _____

Kaili Kuiper
Staff Attorney
Office of the Health Care Advocate
7 Court Street
P.O. Box 606
Montpelier, Vt. 05601
Voice (802) 223-6377 ext. 329
Fax (802) 223-7281

CERTIFICATE OF SERVICE

I, Kaili Kuiper, hereby certify that I have served the above Proposed Questions for the Applicant on Michael N. Donofrio, General Counsel to the Green Mountain Care Board; Donna Jerry, Green Mountain Care Board Health Policy Analyst; Spencer R. Knapp, Sr. V.P. & General Counsel, Fletcher Allen Health Care, Inc.; Steven J. Klein, Assistant General Counsel, Fletcher Allen Health Care, Inc., O. Whitman Smith, representative of the Howard Center, Inc.; and Kimberlee J. Sturtevant, Assistance City Attorney, City of Burlington, by electronic mail, return receipt requested, this 21st day of July, 2014.

s/ Kaili Kuiper _____

Kaili Kuiper
Staff Attorney
Office of the Health Care Advocate